

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHARY EVERETT, on behalf of herself and §
all others similarly situated, §

Plaintiff, §

v. §

MCI, INC., a Delaware Corporation, §

Defendant. §

In re §

WORLDCOM, INC., et al. §

Reorganized Debtors. §

Chapter 11

Case No. 02-13533-AJG
(Jointly Administered)

Case No. 07-9590 (DC)

Adv. No. 07-01792 (AJG)

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DATE

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FILED
2007 DEC 13 AM 9:55
S.D. OF N.Y.

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I Alfredo R. Pérez, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Lydia T. Protopapas
Weil, Gotshal & Manges LLP
700 Louisiana, Suite 1600
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511

Lydia T. Protopapas is a member in good standing of the Bar of the State of Texas. There are no pending disciplinary proceeding against Lydia T. Protopapas in any State or Federal court.

Dated: December 3, 2007
New York, New York

By:

Alfredo R. Pérez (AP 3629)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153-0119
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**SHARY EVERETT, on behalf of herself and
all others similarly situated,**

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**AFFIDAVIT OF ALFREDO R. PÉREZ IN SUPPORT OF
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

Alfredo R. Pérez, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Weil, Gotshal and Manges LLP, counsel for Defendant, MCI, LLC f/k/a MCI, Inc. and n/k/a Verizon Business Global LLC ("MCI") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Lydia T. Protopapas as counsel *pro hac vice* to represent Plaintiff in this matter.
2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law on December 7, 2006. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Lydia T. Protopapas since 1998.
4. Lydia T. Protopapas is a Partner at Weil, Gotshal & Manges LLP, in Houston, Texas.

5. I have found Ms. Protopapas to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move for the admission of Lydia T. Protopapas, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Lydia T. Protopapas, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Lydia T. Protopapas, *pro hac vice*, to represent Defendant in the above-captioned matter, be granted.

Dated: December 3, 2007
New York, New York

Respectfully submitted,

By: 

Alfredo K. Pérez (AP 3629)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153-0119
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ORDER FOR ADMISSION *PRO HAC VICE*

Upon consideration of the motion of Alfredo R. Pérez, attorney for Defendant, MCI, LLC f/k/a MCI, Inc. and n/k/a Verizon Business Global LLC ("MCI") and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Lydia T. Protopapas
Weil, Gotshal & Manges LLP
700 Louisiana, Suite 1600
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
lydia.protopapas@weil.com

is admitted to practice *pro hac vice* as counsel for Defendant, MCI, LLC f/k/a MCI, Inc. and n/k/a Verizon Business Global LLC ("MCI") in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of

attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:
New York, New York

United States District Court Judge

CERTIFICATE OF SERVICE

I, Rene A. Olvera, certify that I caused a true and correct copy of the foregoing Motion to Admit Counsel *Pro Hac Vice* to be served upon the party listed below via First-Class Mail on December 3, 2007.


Rene A. Olvera

A.J. De Bartolomeo
Aaron M. Sheanin
Gerard Gibbs LLP
601 California Street, 14th Floor
San Francisco, CA 94108
ajd@girardgibbs.com
ams@girardgibbs.com

CERTIFICATE OF GOOD STANDING


UNITED STATES OF AMERICA §
 §
SOUTHERN DISTRICT OF TEXAS §

I, MICHAEL N. MILBY, Clerk of the United States District Court for the
SOUTHERN DISTRICT OF TEXAS

DO HEREBY CERTIFY That *Lydia T Protopapas* , Federal ID No. **20660** , was duly
admitted to practice in said Court on **March 14, 1997** and is in good standing as a member of the bar
of said Court.

Dated November 14, 2007 at Houston, Texas.

MICHAEL N. MILBY, Clerk

By: 
Steve Murdock
Deputy Clerk

